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LUCAS VALADEZ and Proposed Class

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Attorneys for Defendants
DELOITTE CONSULTING LLP

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

LUCAS VALADEZ, an individual, on
behalf of himself and other similarly
situated,

Plaintiff,

v.

DELOITTE CONSULTING LLP; and
DOES 1 through 50, inclusive,

Defendant.

Case No. 5:19-cv-07073-BLF

**JOINT STIPULATION OF DISMISSAL;
[PROPOSED] ORDER**

1 WHEREAS, Plaintiff Lucas Valadez filed a complaint in the above-entitled action
2 in the United States District Court for the Northern District of California, Case No. 5:19-
3 cv-07073-SVK (the “Complaint”) against Defendant on October 28, 2019;

4 WHEREAS, Plaintiff’s Complaint alleges two causes of action against defendant
5 Deloitte Consulting, LLP for: (1) Violation of the Fair Credit Reporting Act for Failure to
6 Make Disclosures, 15 U.S.C. § 1681b(b)(2)(A)(i); and Violation of the Fair Credit
7 Reporting Act for Failure to Obtain Proper Authorization, 15 U.S.C.
8 § 1681b(b)(2)(A)(ii);

9 WHEREAS, Plaintiff brought both causes of action on behalf of himself and on
10 behalf of all similarly situated employees;

11 WHEREAS, Plaintiff and defendant Deloitte Consulting, LLP resolved this matter
12 as to Plaintiff’s individual claims on March 18, 2020;

13 THEREFORE, IT IS HEREBY STIPULATED, by and between the Parties and
14 their respective counsel that the Complaint should be dismissed with prejudice as to
15 Plaintiff’s individual claims and without prejudice as to the class claims pursuant to Fed.
16 Rules Civ. Proc., Rule 41(a)(A)(ii). Each party will bear its own expenses, costs, and
17 attorneys’ fees.

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Respectfully submitted,

DATED: April 17, 2020

SEYFARTH SHAW LLP

By: /s/ Eric Suits

Pamela Q. Devata (*pro hac vice*
forthcoming)

Courtney S. Stieber (*pro hac vice*
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Eric Suits

Attorneys for Defendant

DELOITTE CONSULTING LLP

DATED: April 17, 2020

KINGSLEY & KINGSLEY, APC

By: /s/ Eric B. Kingsley

Eric B. Kingsley

Kelsey M. Szamet

David Keledjian

Attorneys for Plaintiff

LUCAS VALADEZ and Proposed Class

Pursuant to Local Rule 5-1(i)(3), the filer attests that concurrence in the filing of this document has been obtained from each of the above signatories.

PROPOSED ORDER

The Court having considered the stipulation of the Parties, orders as follows:

1. The Complaint is dismissed with prejudice as to plaintiff Lucas Valadez's individual claims.
2. The Complaint is dismissed without prejudice as to the class claims.
3. Each Party shall bear their own costs and attorneys' fees.
4. The Court shall retain jurisdiction of this matter to enforce the terms of the March 18, 2020 settlement agreement.

IT IS SO ORDERED:

DATED: April __, 2020

By: _____
The Honorable Judge Beth Labson
Freeman
United States District Court Judge
Northern District of California